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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 782-2829

JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 - (312) 814-6026

ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

(217) 557-8155
(FAX) 782-3258

March 16, 2009

Bill Brawner
Headquarters, Department of the Army
Base Realignment and Closure Division (DAIM-BD)
2530 Crystal Drive
Arlington, VA 22202

Re: 2nd Semi-Annual 2008 Groundwater and
Leachate Monitoring Report, Landfills 6 and 7
Department of Defense Operable Unit
Fort Sheridan, Illinois

0970555001/Lake
Fort Sheridan (BRAC)
Superfund/Technical

Dear Mr. Brawner:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Army's 2nd *Semi-Annual 2008 Groundwater and Leachate Monitoring Report, Landfills 6 & 7, Department of Defense Operable Unit, Fort Sheridan, Illinois*. It was dated February 25, 2009 and was received at the Agency on March 05, 2009. The submittal presents a summary of the groundwater sampling event conducted in November 2008 and details the analytical results. The cover letter also presents the Army's request of "a reduction in the 2006 Revised Leachate Parameter List for Landfills 6 & 7." In addition, the Army requests that one of the up-gradient deep monitoring wells be deleted from the sampling plan to reduce redundancy. Illinois EPA has reviewed the submittal and the Army's requests and is herein providing a response.

The November 2008 report indicates that the leachate and groundwater monitoring program is functioning as intended. There were fewer exceedances reported during this monitoring period, even from within the leachate, than in previous reports. The monitoring results appear to be trending toward the leachate becoming more and more benign. Given the ages of these two landfills and that the RCRA-equivalent caps have been in place now for five years or so, that result would be expected. The Agency is pleased to see that the Army's final remedy is performing in accordance with the approved design.

Regarding the Army's request to delete one of the up-gradient deep monitoring wells from the sampling plan, Illinois EPA cannot concur. As discussed at the most recent BRAC Cleanup Team (BCT) meeting, there is only one well surrounding Landfills 6 and 7 that can, with any reasonable certainty, be considered up-gradient. That well is identified as RSA100. Two other wells (GWLF34 and GWLF35) are at best side-gradient wells and given the uncertainty as to the groundwater flow direction, could, under certain circumstances, potentially be either up or down-gradient. Therefore, removing either of these two wells from the sampling plan would not reduce redundancy as they cannot be labeled as strictly up-gradient wells.

The Army also requested to remove certain parameters from the 2006 Revised Leachate Parameter List for Landfills 6 & 7. Those parameters were identified as Chemical Oxygen Demand, Cyanide, 4,4'-DDD, Aldrin, and Phenolics. The Agency has reviewed the submitted raw data and most of the past monitoring reports along with the pertinent regulations for leachate and groundwater monitoring at landfills and has come to the following decision. At this time, Illinois EPA cannot concur with the removal of any of those parameters from the current list. The determining factor for keeping each of those parameters on the list is provided below.

Chemical Oxygen Demand –	Basic Indicator parameter required for all landfills
Cyanide –	Detected in the leachate as recently as 2005 *
4,4'-DDD –	Detected in the leachate as recently as May 2008 *
Aldrin –	Detected in the leachate as recently as 3 rd Quarter 2006 *
Phenolics –	Detected in the leachate as recently as May 2008 *

- * According to 35 IAC 811.319(a)(2)(A)(i), which has been determined to be an applicable or relevant and appropriate regulation (ARAR), a constituent shall be chosen for monitoring if “The constituent appears in, or is expected to be in, the leachate.”

The decisions provided herein are considered final at this time. However, the Army is free to submit another request for parameter reduction once sufficient additional data has been collected. The most logical time would be along with the next mandatory five-year review.

If you have any questions regarding anything in this correspondence or would like further explanation, you may contact me at 217/557-8155 or via electronic mail at Brian.Conrath@illinois.gov.

Sincerely,

Brian A. Conrath

Brian A. Conrath
Remedial Project Manager
Federal Facilities Unit
Federal Site Remediation Section
Bureau of Land

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cc: Bill O'Donnell, Army BRAC
Howard Hickey, US Navy - EFA Midwest
David Moore, US Army Reserve

Owen Thompson, USEPA (SR-6J)
Kurt Thomsen, Fort Sheridan EC